

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

ROBERT PATRICK LEWIS et al.,	X	
	:	
	:	
Plaintiffs,	:	
	:	
v.	:	Case No. 1:22-cv-00126-PB
	:	
SETH ABRAMSON,	:	
	:	
Defendant.	:	
	X	

EMERGENCY JOINT PROPOSED AMENDMENT TO DISCOVERY PLAN

The Parties jointly submit the following emergency proposed amendment to the Discovery Plan. Due to the recently filed and still pending Motion to Withdraw by the Binnall Law Group and attendant filings, the Parties have jointly agreed to a 14-day extension of deadlines in this matter to allow the Court to set a hearing on the Motion to Withdraw, to allow Plaintiffs time to retain new counsel, and to avoid any issues with the close of discovery. Therefore, the Parties respectfully request this Court enter an order amending this matter's deadlines. On January 14, 2025, this court granted the following dates:

1. Discovery completed by April 14, 2025.
2. Motions for summary judgment submitted by May 14, 2025; responses in opposition 30 days thereafter, and replies 14 days after oppositions.
3. Trial during the Court's November 4, 2025 trial period.

Due to Plaintiffs' counsel pending Motion to Withdraw and Plaintiffs' ongoing search for new counsel, both parties seek an extension of these deadlines by two

weeks, which will allow Plaintiffs time to seek new counsel and provide time for this Court's hearing on the motion. Neither party will be prejudiced by a two-week extension and all Parties consent to the relief requested in this Motion. Plaintiffs reserve the right to seek an additional extension of time to allow new counsel to come up to speed on this matter, and the Defendant reserves the right to object to same

Given the impending discovery deadlines, the parties are filing this as an emergency motion and requested expedited consideration. *See* D.N.H. Local Rule 7.1(f).

Dated: April 7, 2025

/s/ Jason C. Greaves

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that on April 7, 2025, a copy of the foregoing was filed with the Clerk of the Court using the Court's CM/ECF system, which will send a copy to all counsel of record. In addition, this motion has been electronically delivered to all Plaintiffs.

/s/ Jason C Greaves

Jason C. Greaves, *Pro Hac Vice*
Attorney for Plaintiffs